

This is not the official court record. Official records of court proceedings may only be obtained directly from the court maintaining a particular record.

Kasey L. Sandlin v. Bell Sports, Inc.

Case Number	49D13-2007-CT-025983
Court	Marion Superior Court, Civil Division 13
Type	CT - Civil Tort
Filed	07/31/2020
Status	07/31/2020 , Pending (active)

Parties to the Case

Defendant Bell Sports, Inc.

Address c/o National Registered Agents, Inc.
818 West Seventh Street, Suite 930
Los Angeles, CA 90017

Attorney Joseph Gregory Eaton
#1573129, Retained
11 S Meridian ST
Indianapolis, IN 46204
317-236-1300(W)

Plaintiff Sandlin, Kasey L.

Address c/o Stephenson Rife LLP
2150 Intelliplex Drive, Suite 200
Shelbyville, IN 46176

Attorney M. Michael Stephenson
#182473, Lead, Retained
STEPHENSON RIFE LLP
2150 Intelliplex Drive
Suite 200
Shelbyville, IN 46176
317-680-2011(W)

Attorney Brady James Rife
#2537873, Retained
STEPHENSON RIFE LLP
2150 Intelliplex Drive
Suite 200
Shelbyville, IN 46176
317-680-2011(W)

Attorney Sean R Roth
#3083349, Retained
STEPHENSON RIFE LLP
2150 Intelliplex Drive
Suite 200
Shelbyville, IN 46176
317-680-2011(W)

Chronological Case Summary

07/31/2020 **Case Opened as a New Filing**07/31/2020 **Appearance Filed**

Appearance

For Party: Sandlin, Kasey L.

File Stamp: 07/31/2020

07/31/2020 **Complaint/Equivalent Pleading Filed**

Complaint for Damages and Request for Jury Trial

Filed By: Sandlin, Kasey L.

File Stamp: 07/31/2020

07/31/2020 **Subpoena/Summons Filed**

Summons to Bell Sports, Inc.

Filed By: Sandlin, Kasey L.

File Stamp: 07/31/2020

08/03/2020 **Certificate of Issuance of Summons**

Certificate of Issuance of Summons

Filed By: Sandlin, Kasey L.

File Stamp: 08/03/2020

08/14/2020 **Service Returned Served (E-Filing)**

Proof of Service

Filed By: Sandlin, Kasey L.

File Stamp: 08/13/2020

09/02/2020 **Appearance Filed**

Appearance of Joseph G. Eaton

For Party: Bell Sports, Inc.

File Stamp: 09/01/2020

09/02/2020 **Notice Filed**

Proposed Notice of Automatic Initial Enlargement of Time

Filed By: Bell Sports, Inc.

File Stamp: 09/01/2020

Financial Information

* Financial Balances reflected are current representations of transactions processed by the Clerk's Office. Please note that any balance due does not reflect interest that has accrued – if applicable – since the last payment. For questions/concerns regarding balances shown, please contact the Clerk's Office.

Sandlin, Kasey L.

Plaintiff

Balance Due (as of 09/08/2020)

0.00

Charge Summary

Description	Amount	Credit	Payment
Court Costs and Filing Fees	157.00	0.00	157.00

Transaction Summary

Date	Description	Amount
------	-------------	--------

Date	Description	Amount
07/31/2020	Transaction Assessment	157.00
07/31/2020	Electronic Payment	(157.00)

This is not the official court record. Official records of court proceedings may only be obtained directly from the court maintaining a particular record.

STATE OF INDIANA) IN THE MARION _____ COURT
) SS:
 COUNTY OF MARION) CAUSE NO. _____

 KASEY L. SANDLIN,)
)
 Plaintiff,)
)
 vs.)
)
 BELL SPORTS, INC.)
)
 Defendant.)

APPEARANCE

Comes now the firm of STEPHENSON RIFE, LLP, Attorneys at Law, and enters its Appearance on behalf of the Plaintiff, Kasey L. Sandlin.

1. Attorney Information for service as required by Trial Rule 5(B)(2):

Name: M. Michael Stephenson
 Attorney Number: 1824-73
 Name: Brady J. Rife
 Attorney Number: 25378-73
 Name: Sean R. Roth
 Attorney Number: 30833-49
 Address: STEPHENSON RIFE, LLP
 2150 Intelliplex Drive, Suite 200
 Shelbyville, IN 46176
 Phone: (317) 680-2011
 Fax: (317) 680-2012
 Email Addresses: mikestephenson@srtrial.com
bradyrife@srtrial.com
seanroth@srtrial.com

- (a) We certify that the contact information listed for us on the Indiana Supreme Court Roll of Attorneys is current and accurate as of the date of this Appearance;
- (b) We acknowledge that all orders, opinions, and notices from the Court in this matter that are served under Trial Rule 86(G) will be sent to the attorneys at the email addresses specified by the attorneys on the Roll of Attorneys regardless of the contact information listed above for the attorneys; and

- (c) We understand that we are solely responsible for keeping our Roll of Attorneys contact information current and accurate, see Ind. Admission and Discipline Rule 2 (A).
2. This is a CT case type as defined in administrative Rule 8(B)(3).
3. This case involves child support issues. Yes ____ No X
4. This case involves a protection from abuse order, a workplace violence restraining order or a no-contact order. Yes ____ No X
5. This case involves a petition for involuntary commitment. Yes ____ No X
6. There are related cases. Yes ____ No X
7. This form has been served on all other parties and Certificate of Service is provided.
Yes ____ No X

Respectfully submitted,

STEPHENSON RIFE, LLP

/s/ M. Michael Stephenson

M. Michael Stephenson, Attorney No. 1824-73

Brady J. Rife, Attorney No. 25378-73

Sean R. Roth, Attorney No. 30833-49

2150 Intelliplex Drive, Suite 200

Shelbyville, IN 46176

Telephone: (317) 680-2011

Facsimile: (317) 680-2012

Counsel for Plaintiff, Kasey L. Sandlin

STATE OF INDIANA) IN THE MARION _____ COURT
) SS:
 COUNTY OF MARION) CAUSE NO. _____

KASEY L. SANDLIN,)
)
 Plaintiff,)
)
 vs.)
)
 BELL SPORTS, INC.)
)
 Defendant.)

PLAINTIFF’S COMPLAINT FOR DAMAGES AND REQUEST FOR JURY TRIAL

Comes now Plaintiff, Kasey L. Sandlin, by counsel, and in support of her *Complaint for Damages and Request for Jury Trial* against the Defendant, Bell Sports, Inc., alleges and states as follows:

1. At all times material herein, Kasey L. Sandlin (“Ms. Sandlin”) was a resident of Indianapolis, Marion County, Indiana.

2. At all times material herein, Defendant Bell Sports, Inc. (“Bell Sports”) was a California corporation with a principal place of business located at 1001 Innovation Road, Rantoul, IL. Defendant Bell Sports regularly conducts business in, and receives economic benefit from, the business it conducts in the State of Indiana.

3. This Court has jurisdiction over the subject matter of this action and over the parties to this lawsuit.

4. On or around August 8, 2018, Ms. Sandlin was riding a bicycle equipped with Bell-brand alloy bicycle pedals and identified as FP-969 (Bell Pedals”) which were affixed to the crank arm of the bicycle with the pedal adapters provided by Defendant Bell Sports (“Bell Pedal

Adapter”) when the Bell Pedal and/or Bell Pedal Adapter (collectively the “Bell Pedal System”) suffered a catastrophic failure causing Ms. Sandlin to lose control of the bicycle and crash.

5. At all times relevant herein, Defendant Bell Sports designed, manufactured, engineered, fabricated, inspected, marketed, distributed, sold and warranted the Bell Pedal System to consumers such as Ms. Sandlin.

6. As a proximate result of the defective and unreasonably dangerous Bell Pedal System, Ms. Sandlin experienced traumatic, permanent and painful injuries, including a traumatic brain injury, incurred medical expenses, pain and suffering and other pecuniary damages. Ms. Sandlin’s damages are ongoing and indefinite.

COUNT I

7. Ms. Sandlin realleges and incorporates paragraphs 1 through 6 as if fully set forth herein.

8. At all times material herein, Defendant Bell Sports was a merchant who specialized in the manufacture, design, engineering, fabrication, building, assembly, marketing, distribution and/or sale of bicycle accessories including, without limitation, the Bell Pedal System.

9. As a merchant specializing in the manufacture, design, engineering, fabrication, building, assembly, marketing, distribution and/or sale of bicycle accessories including, without limitation, the Bell Pedal System, Defendant Bell Sports sold the Bell Pedal System subject to the implied warranty of merchantability.

10. Defendant Bell Sports impliedly warranted that the Bell Pedal System was merchantable and fit for its ordinary purpose and Defendant Bell Sports did not disclaim said implied warranty of merchantability.

11. At all times material herein, the Bell Pedal System was not fit for its ordinary purpose for which goods of the type were used and Defendant Bell Sports breached its implied warranty of merchantability.

12. As a direct and proximate result of Defendant Bell Sports' breach of the implied warranty of merchantability, Ms. Sandlin sustained traumatic and catastrophic damages for which Defendant Bell Sports is liable.

COUNT II

13. Ms. Sandlin realleges and incorporates paragraphs 1 through 12 as if fully set forth herein.

14 At all times material herein, Defendant Bell Sports manufactured, designed, assembled, constructed, packaged, labeled, engineered, fabricated, produced, distributed, sold and expressly warranted the Bell Pedal System.

15. As designers, engineers, assemblers, fabricators, producers, constructors, packagers, labelers, manufacturers, distributors, sellers and warrantors of the Bell Pedal System, Defendant Bell Sports is strictly liable to Ms. Sandlin in the event that the Bell Pedal System is defective and unreasonably dangerous and such defect(s) proximately caused Ms. Sandlin's injuries and damages.

16. The Bell Pedal System was defective and unreasonably dangerous in that:

- (a) Ms. Sandlin was in the class of persons that the Defendant Bell Sports should reasonably foresee as being subject to the harm caused by the defective condition of the Bell Pedal System;
- (b) The Bell Pedal System was expected to and did reach Ms. Sandlin without substantial alteration in the condition in which it was sold;
- (c) The defective and unreasonably dangerous condition of the Bell Pedal System existed at the time it left Defendant Bell Sports' control; and

- (d) The defective and unreasonably dangerous condition of the Bell Pedal System was the proximate cause of Ms. Sandlin's injuries and damages.

17. Defendant Bell Sports sold or otherwise put into the stream of commerce the Bell Pedal System in a defective condition unreasonably dangerous to any user or consumer or to the user's or consumer's property.

18. As designed and/or manufactured, the Bell Pedal System was defective and unreasonably dangerous to ordinary consumers using the Bell Pedal System in an intended and/or reasonably foreseeable manner.

19. Defendant Bell Sports failed to exercise reasonable care under the circumstances in designing and/or manufacturing the Bell Pedal System.

20. The Bell Pedal System failed to perform as safely as an ordinary consumer would expect when using the Bell Pedal System in an intended and/or reasonably foreseeable manner.

21. The defective condition of the Bell Pedal System was a proximate cause of Ms. Sandlin's injuries and damages.

22. As a direct and proximate result of the defective condition of the Bell Pedal System, Ms. Sandlin sustained traumatic and catastrophic damages for which Defendant Bell Sports is liable.

COUNT III

23. Ms. Sandlin realleges and incorporates paragraphs 1 through 22 as if fully set forth herein.

24. At all times relevant herein, Defendant Bell Sports owed a duty to exercise reasonable care in all aspects of the manufacture, design, packaging, labeling, warning,

engineering, fabrication, building, assembly, distribution, marketing, presentation, warranty and sale of the Bell Pedal System.

25. At all times relevant herein, Defendant Bell Sports failed to exercise ordinary care and breached its duty of care in the manufacture, design, packaging, labeling, warning, engineering, fabrication, building, assembly, distribution, marketing, presentation, warranty and sale of the Bell Pedal System.

26. As a direct and proximate result of Defendant Bell Sports' negligent actions and omissions as set forth herein, Ms. Sandlin sustained traumatic and catastrophic damages for which Defendant Bell Sports is liable.

WHEREFORE, Plaintiff, Kasey L. Sandlin, by counsel, prays that the Court enter judgment against the Defendant Bell Sports, Inc. and in her favor in an amount sufficient to reasonably compensate her for her personal injuries, medical expenses incurred and to be incurred in the future, disfigurement, pain and suffering, mental anguish, lost wages, and all other damages recoverable under law, for costs and for all other relief just and proper in the premises.

JURY DEMAND

Comes now the Plaintiff, Kasey L. Sandlin, and requests a trial by jury of this matter.

Respectfully submitted,

STEPHENSON RIFE LLP

/s/ M. Michael Stephenson

M. Michael Stephenson, Atty. No. 1824-73
Brady J. Rife, Atty. No. 25378-73
Sean R. Roth, Atty. No. 30833-49
Attorneys for Plaintiff, Kasey L. Sandlin

STEPHENSON RIFE, LLP
2150 Intelliplex Drive, Suite 200
Shelbyville, IN 46176
Phone: (317) 680-2011
Fax: (317) 680-2012
mikestephenson@srtrial.com
bradyrife@srtrial.com
seanroth@srtrial.com

SUMMONS

STATE OF INDIANA) IN THE MARION _____ COURT
) SS:
 COUNTY OF MARION) CAUSE NO. _____

KASEY L. SANDLIN,

Plaintiff,

vs.

BELL SPORTS, INC.

Defendant.

THE STATE OF INDIANA TO DEFENDANT:

Bell Sports, Inc.
 c/o National Registered Agents, Inc.
 818 West Seventh Street, Suite 930
 Los Angeles, CA 90017

You have been sued by the persons named "Plaintiffs", in the court stated above.

The nature of the suit against you is stated in the complaint which is attached to this summons. It also states the demand which the plaintiffs have made against you.

You must answer the complaint in writing, by you or your attorney, within twenty (20) days, commencing the day after you receive this summons, (you have twenty-three (23) days to answer if this summons was received by mail), or judgment will be entered against you for what the plaintiffs have demanded.

If you have a claim for relief against the plaintiffs arising from the same transaction or occurrence, you must assert it in your written answer.

The following manner of service of summons is hereby designated:

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Date: 7/31/2020

Myla A. Eldridge
 Clerk of Marion County, Indiana
 City-County Building, Room W-122
 200 East Washington Street
 Indianapolis, IN 46204
 (317) 327-4740

M. Michael Stephenson, Attorney No. 1824-73
 Brady J. Rife, Attorney No. 25378-73
 Sean R. Roth, Attorney No. 30833-49
 Attorneys for Plaintiff
 STEPHENSON RIFE LLP
 2150 Intelliplex Drive, Suite 200
 Shelbyville, Indiana 46176
 Telephone: (317) 680-2011



CERTIFICATE OF MAILING

I hereby certify that on the _____ day of _____, 2020, I mailed a copy of this Summons and a copy of the Complaint to the defendant by certified mail requesting a return receipt signed by the addressee only addressed to the defendant at the address furnished by the plaintiff.

Date: _____

RETURN OF SERVICE OF SUMMONS BY MAIL

I hereby certify that service of summons with return receipt requested was mailed on the _____ day of _____, 2020, and that a copy of return receipt was received on the _____ day of _____, 2020, which copy is attached herewith.

Date: _____

CERTIFICATE OF CLERK OF SUMMONS NOT ACCEPTED BY MAIL

I hereby certify that on _____ day of _____, 2020, I mailed a copy of this Summons and a copy of the Complaint to the defendant by certified mail, and the same was returned without acceptance this _____ day of _____, 2020, and I did deliver said summons and a copy of the complaint to the Sheriff of _____ County, Indiana.

Date: _____

RETURN OF SERVICE OF SUMMONS

I hereby certify that I have served the within summons:

1. By delivering on the _____ day of _____, 2020, a copy of this Summons and a copy of the Complaint to the defendant.

2. By leaving on the _____ day of _____, 2020, for the named defendant a copy of the Complaint at the respective dwelling house or usual place of abode and by mailing a copy of said summons to said defendant at the above address.

All done in _____ County, Indiana.

Fees: \$ _____

Mileage: _____

Total: \$ _____

Sheriff of _____ County, Indiana

By: _____

SERVICE ACKNOWLEDGED

A copy of the within Summons and a copy of the Complaint attached hereto were received by me this _____ day of _____, 2020.

Signature of Defendant

STATE OF INDIANA)	IN THE MARION SUPERIOR COURT 13
) SS:	
COUNTY OF MARION)	CAUSE NO. 49D13-2007-CT-025983
KASEY L. SANDLIN,)	
)	
Plaintiff,)	
)	
vs.)	
)	
BELL SPORTS, INC.,)	
)	
Defendant.)	

CERTIFICATE OF ISSUANCE OF SUMMONS

I, M. Michael Stephenson, Attorney for the Plaintiff, Kasey L. Sandlin, do hereby certify that on the 3rd day of August, 2020, I sent file-stamped copies of the Summons and Complaint for Damages and Request for Jury Trial, in the above-captioned case to the following Defendant by certified mail:

Party Served:	Bell Sports, Inc.
Address of Party:	c/o National Registered Agents, Inc.
	818 West Seventh Street, Suite 930
	Los Angeles, CA 90017
Method of Service:	Certified Mail
Tracking/Identification Number:	7013 2630 0002 2200 9548

Respectfully submitted,

STEPHENSON RIFE LLP

/s/ M. Michael Stephenson
M. Michael Stephenson, Attorney No. 1824-73
2150 Intelliplex Drive, Suite 200
Shelbyville, IN 46176
Telephone: (317) 680-2011
Facsimile: (317) 680-2012
Attorney for Plaintiff, Kasey L. Sandlin

STATE OF INDIANA) IN THE MARION SUPERIOR COURT 13
) SS:
 COUNTY OF MARION) CAUSE NO. 49D13-2007-CT-025983

KASEY L. SANDLIN,

Plaintiff,

vs.

BELL SPORTS, INC.,

Defendant.

PROOF OF SERVICE

I, M. Michael Stephenson, Attorney for the Plaintiff, Kasey L. Sandlin, mailed a file-stamped copy of the Summons and Complaint for Damages and Request for Jury Trial to the Defendant, Bell Sports, Inc., by certified mail on August 3, 2020.

Bell Sports, Inc. was served on August 10, 2020. The signed return receipt is attached hereto as Exhibit A.

Respectfully submitted,

STEPHENSON RIFE LLP

/s/ M. Michael Stephenson

M. Michael Stephenson, Attorney No. 1824-73

2150 Intelliplex Drive, Suite 200

Shelbyville, IN 46176

Telephone: (317) 680-2011

Facsimile: (317) 680-2012

Attorney for Plaintiff, Kasey L. Sandlin

USPS TRACKING#



9590 9402 5356 9189 8617 15

United States Postal Service


• Sender: Please print your name, address, and ZIP+4® in this box*

M. Michael Stephenson
Stephenson Rife LLP
2150 Intelliplex Drive, Suite 200
Shelbyville, IN 46176

Sandlin Complaint



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <i>Luis Garcia</i></p> <p>B. Recipient (Printed Name) <i>Luis Garcia</i></p> <p>C. Date of Delivery <i>8-10-20</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p>Bell Sports, Inc. c/o National Registered Agents, Inc. 818 West Seventh Street, Suite 930 Los Angeles, CA 90017</p>  <p>9590 9402 5356 9189 8617 15</p>	<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p> <p><input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input checked="" type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery</p>
<p>2. Article Number (Transfer from service label)</p> <p>7013 2630 0002 2200 9548</p>	<p>Domestic Return Receipt</p>

PS Form 3811, July 2015 PSN 7530-02-000-9053

STATE OF INDIANA) IN THE MARION SUPERIOR COURT
) SS: CIVIL DIVISION
 COUNTY OF MARION) CAUSE NO. 49D13-2007-CT-025983

KASEY L. SANDLIN,

Plaintiff,

vs.

BELL SPORTS, INC.,

Defendant.

APPEARANCE BY ATTORNEY IN CIVIL CASE

This Appearance Form must be filed on behalf of every party in a civil case.

1. The party on whose behalf this form is being filed is:

Initiating ___ Responding X Intervening ___ ; and

the undersigned attorney and all attorneys listed on this form now appear in this case for the following parties:

Name of party: **Bell Sports, Inc.**

Address of party (see Question # 6 below if this case involves a protection from abuse order, a workplace violence restraining order, or a no-contact order)

Telephone # of party _____

(List on a continuation page additional parties this attorney represents in this case.)

2. Attorney information for service as required by Trial Rule 5(B)(2)

Name: Joseph G. Eaton Atty Number: 15731-29

Address: Barnes & Thornburg LLP, 11 South Meridian Street, Indianapolis, IN 46204

Phone: 317-236-1313

FAX: 317-231-7433

Email Address: joe.eaton@btlaw.com

3. This is a **CT** case type as defined in administrative Rule 8(B)(3).
4. I will accept service by FAX at the above noted number: Yes ___ No X
5. This case involves child support issues. Yes ___ No X (If yes, supply social security numbers for all family members on a separately attached document filed as confidential information on **light green paper**. Use Form TCM-TR3.1-4.)
6. This case involves a protection from abuse order, a workplace violence restraining order, or a no-contact order. Yes ___ No X (If Yes, the initiating party must provide an address for the purpose of legal service but that address should not be one that exposes the whereabouts of a petitioner.) The party shall use the following address for purposes of legal service:

____ Attorney's address
 ____ The Attorney General Confidentiality program address
 (contact the Attorney General at 1-800-321-1907 or e-mail address is **confidential@atg.state.in.us**).
 ____ Another address (provide)

7. This case involves a petition for involuntary commitment. Yes ___ No X
8. If Yes above, provide the following regarding the individual subject to the petition for involuntary commitment:
 - a. Name of the individual subject to the petition for involuntary commitment if it is not already provided in #1 above: _____
 - b. State of Residence of person subject to petition: _____
 - c. At least one of the following pieces of identifying information:
 - (i) Date of Birth _____
 - (ii) Driver's License Number _____
 State where issued _____ Expiration date _____
 - (iii) State ID number _____
 State where issued _____ Expiration date _____
 - (iv) FBI number _____
 - (v) Indiana Department of Corrections Number _____
 - (vi) Social Security Number is available and is being provided in an attached confidential document Yes ___ No ___
9. There are related cases: Yes ___ No X (If yes, list on continuation page.)

10. Additional information required by local rule:

11. There are other party members: Yes ____ No X (If yes, list on continuation page.)

12. This form has been served on all other parties and Certificate of Service is attached:
Yes X No ____

Dated: September 1, 2020

s/ Joseph G. Eaton

Joseph G. Eaton, No. 15731-29
BARNES & THORNBURG LLP
11 South Meridian Street
Indianapolis, Indiana 46204
Telephone: (317) 236-1313
Facsimile: (317) 231-7433
joe.eaton@btlaw.com

*Attorneys for Defendant
Bell Sports, Inc.*

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was electronically served on the following counsel of record via the Indiana Electronic Filing System (“IEFS”) on this 1st day of September, 2020:

M. Michael Stephenson
Brady J. Rife
Sean R. Roth
STEPHENSON RIFE, LLP
21450 Intelliplex Drive, Suite 200
Shelbyville, IN 46176
mikestephenson@srtrial.com
bradyrife@srtrial.com
seanroth@srtrial.com

/s/ Joseph G. Eaton

STATE OF INDIANA)	IN THE MARION SUPERIOR COURT
) SS:	CIVIL DIVISION
COUNTY OF MARION)	CAUSE NO. 49D13-2007-CT-025983
KASEY L. SANDLIN,)	
)	
Plaintiff,)	
)	
vs.)	
)	
BELL SPORTS, INC.,)	
)	
Defendant.)	
)	
)	

**NOTICE OF INITIAL ENLARGEMENT OF TIME
TO RESPOND TO COMPLAINT**

Bell Sports, Inc. (“Defendant”) pursuant to Indiana Trial Rule 6(B)(1) and Marion County Civil Rule of Procedure 5.1(D), moves for an initial enlargement of time to answer or otherwise respond to the Plaintiff’s Complaint. Defendant’s response to the Complaint is currently due on or before September 1, 2020. Defendant’s time to respond to Plaintiff’s Complaint has not been previously enlarged and has not yet expired. Pursuant to Marion County Civ. R. P. 5.1(D), Defendant’s time for responding to the Complaint is enlarged to and including October 1, 2020, without a written order from this Court.

Respectfully submitted,

/s/ Joseph G. Eaton

Joseph G. Eaton (#15731-29)
BARNES & THORNBURG
11 South Meridian Street
Indianapolis, Indiana 46204
Telephone: (317) 236-1313
Facsimile: (317) 231-7433

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was electronically served on the following counsel of record via the Indiana Electronic Filing System (“IEFS”) on this 1st day of September, 2020:

M. Michael Stephenson
Brady J. Rife
Sean R. Roth
STEPHENSON RIFE, LLP
21450 Intelliplex Drive, Suite 200
Shelbyville, IN 46176
mikestephenson@srtrial.com
bradyrife@srtrial.com
seanroth@srtrial.com

/s/ Joseph G. Eaton